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UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA

MEDSQUIRE, LLC) Case No. CV11-4504-JHN (PLAx)

Plaintiff)

vs.)

SPRING MEDICAL SYSTEMS, INC.;)
QUEST DIAGNOSTICS, INC.;)
NEXTGEN HEALTHCARE)
INFORMATION SYSTEMS, INC.;)
HENRY SCHEIN MEDICAL SYSTEMS,)
INC.; HEWLETT-PACKARD)
COMPANY; APRIMA MEDICAL)
SOFTWARE, INC.;)
eCLINICALWORKS, LLC; MED3000,)
INC.; PULSE SYSTEMS, INC.;)
COMPULINK BUSINESS SYSTEMS,)
INC.; NEXTECH SYSTEMS, INC.;)
NAVINET, INC.; successEHS, INC.;)
athenaHEALTH, INC.)

Defendants.)

)
) **NOTICE OF REQUEST AND**
) **REQUEST TO ENTER DEFAULT**
) **AGAINST DEFENDANT NAVINET,**
) **INC.**

1 TO THE CLERK OF THE ABOVE-ENTITLED COURT, NAVINET, INC.,
2 AND TO ITS COUNSEL OF RECORD:

3 Plaintiff Medsquire, LLC ("Medsquire") hereby requests that the Clerk of the
4 above-entitled Court enter default in this matter against defendant NaviNet, Inc.
5 ("NaviNet") on the ground that said defendant has failed to respond to the Second
6 Amended Complaint within the time prescribed by the Order of this Court entered
7 October 25, 2011.

8 As set forth in the accompanying Declaration of Lawrence M. Hadley,
9 Medsquire served NaviNet with the Complaint on June 2, 2011. On July 18, 2011,
10 NaviNet appear in the action, through its counsel, John, M. Adams, by filing a Joinder
11 in a motion to dismiss. After the Court granted the motion to dismiss, and Medsquire
12 amended the Complaint, NaviNet and the other defendants stipulated with Medsquire
13 regarding the filing of a Second Amended Complaint ("SAC"). On October 25, 2011
14 the Court granted the stipulation, and ordered that Medsquire file its SAC on that date.
15 The Court's Order also directed that each Defendant respond to the SAC on or before
16 November 8, 2011. In accordance with the Court's Order, Medsquire manually filed
17 the SAC on October 25, 2011. On October 27, 2011, Medsquire electronically filed
18 the Second Amended Complain as stamped "filed" by the Court. On October 27,
19 2011, the Court's Case Management/Electronic Case Files ("CM/ECF") provided
20 email notification of the filing of the Second Amended Complaint.

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22 DATED: November 10, 2011 MCKOOL SMITH HENNIGAN, P.C.
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25 By /s/Lawrence M. Hadley
26 Attorneys for Plaintiff, MEDSQUIRE LLC
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